

I am writing to request that the FCC not modify current Part 15 regulations to permit increased power limits for Broadband over Power Line (BPL) systems, or modify requirements that prohibit Part 15 interference to licensed users. It has been demonstrated that BPL pilot systems operating under current regulations can and do cause harmful interference to licensed users of the radio spectrum.

The National Telecommunications and Information Administration (NTIA) study released this week acknowledges that BPL signals "unintentionally radiate" from power lines. The NTIA also said current FCC Part 15 measurement techniques may "significantly underestimate" peak BPL field strength. At the same time many promoters of BPL systems ignore even the potential for interference to licensed users, engineers working for the NTIA and the Amateur Radio Relay League have determined that BPL transmitters operating within Part 15 limits significantly increase the noise floor for land-mobile receivers on frequencies below 30 MHz.

I believe it is critical for the country to proceed cautiously with BPL implementation. It is not appropriate to grant BPL systems authorization to transmit at higher power levels before they have demonstrated their ability and willingness to mitigate interference to licensed users of the radio spectrum.

Until it is demonstrated that BPL developers can eliminate harmful interference under current regulations, I request that the FCC not relax Part 15 field strength limits for BPL systems.

Sincerely,

John Lockhart